

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:22-cv-294-JRG
)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF YANAN ZHAO IN SUPPORT OF NETLIST, INC.'S
MOTION TO COMPEL 30(B)(6) DEPOSITION TESTIMONY AND
RESPONSES TO QUESTIONS FOR WHICH SAMSUNG'S COUNSEL
IMPROPERLY INSTRUCTED SEUNGMO JUNG NOT TO ANSWER**

I, Yanan Zhao, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for Plaintiff Netlist, Inc. (“Netlist”) in the above captioned action. I am a member of good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Motion to Compel 30(b)(6) Deposition Testimony and Responses to Questions for which Samsung’s Counsel Improperly Instructed SeungMo Jung Not to Answer.

2. Attached as **Exhibit A** is a true and correct excerpted copy of Netlist’s First Notice of Deposition to Defendants Pursuant to Rule 30(b)(6), dated October 19, 2023.

3. Attached as **Exhibit B** is a true and correct copy of email communications from Samsung’s Counsel to Netlist’s Counsel dated November 10, 2023.

4. Attached as **Exhibit C** is a true and correct excerpted copy of Exhibit B to Netlist’s Preliminary Infringement Contentions, served on November 17, 2022.

5. Attached as **Exhibit D** is a true and correct excerpted copy of Exhibit D to Netlist’s Second Supplemental Infringement Contentions, served on February 7, 2023.

6. Attached as **Exhibit E** is a true and correct copy of the rough transcript of the deposition of SeungMo Jung, taken on November 13, 2023.

7. Attached as **Exhibit F** is a true and correct copy of email communications from Netlist’s Counsel to Samsung’s Counsel dated November 17, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 20, 2023, in Los Angeles, California.

By /s/ Yanan Zhao
Yanan Zhao